

**REMARKS**

Applicant thanks the Examiner for the indication that the previous objection to the drawings, as well as the previous objection to claim 10, have been withdrawn.

Applicant also thanks the Examiner for the indication that the previous rejections under 35 U.S.C. § 112, first paragraph and second paragraph, have been withdrawn.

**Claim Objections**

Claim 12 has been objected to because the phrase “writing data in said second storage means data as instructed by a processor” is improper. Applicant has deleted the second occurrence of the word “data.” Applicant respectfully submits that this rejection should be withdrawn.

**Claim Rejections**

Claim 12 has been rejected under 35 U.S.C. § 112, second paragraph, as lacking antecedent basis for the phrase “said second storage means.” Applicant has amended the claim to recite “a second storage means.” Applicant respectfully submits that this rejection should be withdrawn.

Claims 1, 2, 4, 5, 11-13, 15, 16, 18 and 19 have been rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,820,211 to Kalman (“Kalman”). Applicant traverses this rejection.

Kalman does not disclose or suggest at least a logical disk writing/reading means for writing data in said second storage means when instructed by said processor unit and reporting completion of writing to said processor unit, as recited in independent claim 1. The Examiner alleges that Kalman’s operation of waiting for the next data request (OA, page 4), is an

indication of completion. However, Kalman's decision action in block 208 of Fig. 3 is not, despite the Examiner's assertion to the contrary, a report of completion as set forth in the claim. The logical disk writing means recited in claim 1 reports proper completion of writing to the processor unit, allowing the processor unit to properly terminate data writing. The logical disk writing means does not merely stop writing as disclosed by Kalman. Therefore, even broadly construed, Kalman's lack of a writing operation in block 208 of Fig. 3 is not equivalent to reporting completion of writing to the processor unit, as set forth in the claim.

For at least the above reasons, independent claim 1 is patentable over Kalman. Independent claims 11, 12, 15, 18 and 19 contain features similar to the features recited by claim 1 and are therefore patentable for similar reasons. Claims 2, 4, 5, 13 and 16 depend from one of claims 1, 12 and 15 and are patentable at least by virtue of their dependencies.

Claims 6, 7, 9 and 10 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Kalman in view of U.S. Patent No. 5,600,783 to Kakuta et al. ("Kakuta"). Applicant traverses this rejection.

The combination of Kalman and Kakuta does not disclose or suggest the features of independent claim 6. As established above, Kalman fails to disclose or suggest at least a logical disk writing/reading means for writing data in said second storage means when instructed by said processor unit and reporting completion of writing to said processor unit. Claim 6 recites features similar to these features, therefore Kalman fails to disclose or suggest at least these features of claim 6. Kakuta does not cure the deficiencies of Kalman.

The Examiner relies on Kakuta merely to disclose reading data from a second storage means based on a received processor command. Even if one of ordinary skill in the art at the

time the invention was made had been motivated to combine the references, the combination still would not result in the claimed features.

Therefore, independent claim 6 is patentable over the combination of Kalman and Kakuta. Claims 7, 9 and 10, which depend from claim 6, are patentable at least by virtue of their dependency.

Claims 3, 8, 14 and 17 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Kalman in view of Applicant's admitted prior art. Applicant traverses this rejection.

The combination of Kalman and Applicant's admitted prior art does not disclose or suggest the features of claims 3, 8, 14 and 17. As established above, Kalman fails to disclose or suggest at least a logical disk writing/reading means for writing data in said second storage means when instructed by said processor unit and reporting completion of writing to said processor unit, as set forth in these claims by virtue of their dependencies on claims 1, 8, 12 and 15, respectively. Applicant's admitted prior art does not cure at least the above-noted deficiencies of Kalman.

The Examiner relies on Applicant's admitted prior art to disclose a management table updating means. Applicant's admitted prior art does not, however, disclose or suggest at least the above-noted claim features. Therefore, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination still would not result in the features of claims 3, 8, 14 and 17.

For at least the above reasons, claims 3, 8, 14 and 17 are patentable over The combination of Kalman and Applicant's admitted prior art.

AMENDMENT UNDER 37 C.F.R. § 1.116  
U.S. Application No. 10/664,890


Attorney docket No. Q77475

**Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
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